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K6 FILED IN THE
U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

NOV 16 2022

SEAN F. McAVOY, CLERK
SPOKANE, WASHINGTON DEPUTY

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,

Plaintiff,

V.

GAGE LYLE FORSBERG,
BRADY DAVID TOWNER,
JONAH GREGORY CHAPIN, and
EVAMARIE MICHELLE MILLER,

Defendants.

The Grand Jury charges:

2:22-CR-162-TOR

INDICTMENT

Vio.: 21 U.S.C. § 841(a)(1),
(b)(1)(B)(vi), 18 U.S.C. § 2
Distribution of 40 Grams or
More of Fentanyl
(Count 1)

21 U.S.C. §§ 841(a)(1),
(b)(1)(B)(vi), 846
Conspiracy to Distribute 40
Grams or More of Fentanyl
(Count 2)

21 U.S.C. § 853
Forfeiture Allegations

COUNT 1

On or about October 26, 2022, in the Eastern District of Washington, the Defendants, GAGE LYLE FORSBERG, BRADY DAVID TOWNER, and JONAH GREGORY CHAPIN, knowingly and intentionally distributed 40 grams or more of a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-

1 phenylethyl)-4-piperidinyl] propanamide (a/k/a fentanyl), a Schedule II controlled
2 substance, in violation of 21 U.S.C. § 841(a)(1), (b)(1)(B)(vi) and 18 U.S.C. § 2.
3

4 COUNT 2

5 Beginning on a date unknown, but by on or about October 26, 2022 and
6 continuing to on or about November 15, 2022, in the Eastern District of Washington,
7 the Defendants, GAGE LYLE FORSBERG, BRADY DAVID TOWNER, JONAH
8 GREGORY CHAPIN and EVAMARIE MICHELLE MILLER, and other individuals,
9 both known and unknown to the Grand Jury, did knowingly and intentionally
10 combine, conspire, confederate and agree together with each other to commit the
11 following offense: distribution of 40 grams or more of a mixture or substance
12 containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl]
13 propanamide (a/k/a fentanyl), a Schedule II controlled substance, in violation of 21
14 U.S.C. §§ 841(a)(1), (b)(1)(B)(vi), 846.
15

16 NOTICE OF CRIMINAL FORFEITURE

17 The allegations contained in this Indictment are hereby realleged and
18 incorporated by reference for the purpose of alleging forfeitures.
19

20 Pursuant to 21 U.S.C. § 853, upon conviction of an offense in violation of 21
21 U.S.C. § 841 and/or 21 U.S.C. § 846, as set forth in this Indictment, the Defendants,
22 GAGE LYLE FORSBERG, BRADY DAVID TOWNER, JONAH GREGORY
23 CHAPIN and EVAMARIE MICHELLE MILLER, shall forfeit to the United States of
24 America, any property constituting, or derived from, any proceeds
25

1 obtained, directly or indirectly, as the result of such offense and any property used or
2 intended to be used, in any manner or part, to commit or to facilitate the commission
3 of the offense.

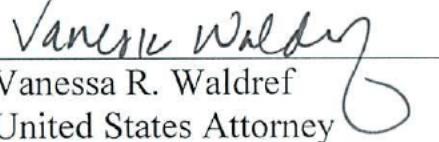
4
5 If any forfeitable property, as a result of any act or omission of the Defendants:

6
7 a. cannot be located upon the exercise of due diligence;
8 b. has been transferred or sold to, or deposited with, a third party;
9 c. has been placed beyond the jurisdiction of the court;
10 d. has been substantially diminished in value; or
11 e. has been commingled with other property which cannot be divided
12 without difficulty,

13 the United States of America shall be entitled to forfeiture of substitute property
14 pursuant to 21 U.S.C. § 853(p).

15
16 DATED this 16th day of November 2022.

17 A TRUE BILL
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20 
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24 Caitlin Baunsgard
25 Assistant United States Attorney
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